

Exhibit M

From: [Tekeei, Negar \(USANYS\)](#)
To: [Jerry Cariglio](#)
Cc: [Enzer, Samson \(USANYS\)](#); [Korologos, Lisa \(USANYS\)](#); [Nessim, Daniel \(USANYS\)](#)
Subject: RE: U.S. v. Sharma, et al., 18 Cr. 340 (LGS)
Date: Monday, April 15, 2019 10:49:00 PM

Hi, Jerry,

In September 2018, we produced a copy of the entire Slack search warrant returns to all defense counsel (on consent of all defense counsel). On January 15, 2019 and again on February 7, 2019, we produced the Slack search warrant returns that the Filter Team had released to the prosecution team and which the prosecution team marked as responsive to the search warrant.

Thanks,
Negar

From: Jerry Cariglio
Sent: Monday, April 15, 2019 4:56 PM
To: Tekeei, Negar (USANYS)
Cc: Enzer, Samson (USANYS) ; Korologos, Lisa (USANYS) ; Nessim, Daniel (USANYS)
Subject: Re: U.S. v. Sharma, et al., 18 Cr. 340 (LGS)

Negar/Sam,

Were the Slack documents that we have reviewed by the taint team?

Sincerely,
Jerry

Sent from my iPhone

On Apr 15, 2019, at 12:05 PM, Tekeei, Negar (USANYS) <Negar.Tekeei@usdoj.gov> wrote:

Jerry,

Following up on our correspondence and telephone calls regarding various discovery and disclosure matters, we wanted to check in on the status of four specific outstanding items:

1. On January 23, 2019, we requested that you let us know a date by when Centra Tech and your client will produce documents and materials responsive to the grand jury subpoenas served on the Centra Tech via its outside counsel at Ballard Spahr LLP in April 2018 and on your client as a custodian of record for Centra Tech in April 2018. Our January 23, 2019 email is attached. To date, we have not received any such records. Please produce these records and materials by April 22, 2019, or let us know as soon as possible when you intend to produce these materials.
2. Also on January 23, 2019 (see the attached email), we requested that you let us know if your client or Centra Tech intend to assert any privilege claim over communications between representatives of Centra Tech and purported attorney "Eric Pope." You previously conveyed that you wanted to further consider this issue, but, to date, we have not received your response. Please respond by April 22, 2019. Should your client or Centra Tech assert a privilege over such communications, we reserve the right to argue that the privilege has

been waived or is otherwise inapplicable.

3. On February 7, 2019, the Filter Team produced to you records (which had been previously produced to all counsel) from a laptop belonging to Allan Shutt (the "Shutt Laptop") organized in three categories based on a set of specific search terms. The Filter Team's February 7, 2019 letter is attached. The Filter Team also requested that you provide a privilege log for any potentially privileged documents you identified on the Shutt Laptop. When we last discussed this issue, you requested additional time past February 22, 2019 to review the Shutt Laptop materials. To date, we have not received your responses. Please let us know if you have identified any potentially privileged materials from the Shutt Laptop, and, if so, produce a privilege log of those materials by April 22, 2019. On the other hand, if you have not identified any potentially privileged materials, please also let us know so that the Filter Team can release those materials to the prosecution team. We are copying the Filter Team, Lisa Korologos and Daniel Nessim, if you have any questions specifically for them.
4. On February 20, 2019, we requested, in the attached letter, that each defendant disclose whether he intends to assert any defense based on alleged advice of counsel to any of the crimes charged in the Indictment and, if so, to produce all discovery relating to such a defense. You previously requested additional time past March 1, 2019 to respond to our requests, but as of this date we have not received your response. Please inform us by April 22, 2019 as to whether your client intends to assert a defense based on alleged advice of counsel, and what the scope and nature of such a defense will be (see page 2 of the Government's February 20, 2019 letter, outlining our specific requests).

As always, please let us know if you have any questions.

Negar Tekeei

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<2019.02.20 Government Request for Discovery re Advice of Counsel - All Centra Defendants.pdf>

<2019.02.07 Cover Letter - Shutt Laptop.pdf>